

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to HTA and  
PBA.

ORDER GRANTING FIVE HUNDRED FIFTEENTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO CLAIMS  
FOR WHICH THE DEBTORS ARE NOT LIABLE

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Upon the *Five Hundred Fifteenth Omnibus Objection (Substantive) of the Puerto Rico Highways and Transportation Authority and the Puerto Rico Public Buildings Authority to Claims for Which the Debtors are Not Liable* [ECF No. 22252] (the “Five Hundred Fifteenth Omnibus Objection”),<sup>2</sup> filed by the Puerto Rico Highways and Transportation Authority (“HTA”) and the Puerto Rico Public Buildings Authority (“PBA,” and together with HTA, the “Debtors”), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Five Hundred Fifteenth Omnibus Objection and

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Five Hundred Fifteenth Omnibus Objection.

supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Fifteenth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Fifteenth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Fifteenth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which HTA and/or PBA are not liable; and the Court having determined that the relief sought in the Five Hundred Fifteenth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Fifteenth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Fifteenth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22252 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Fifteenth Omnibus Objection**

## Five Hundred Fifteenth Omnibus Objection

## Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	BUFETE ENRIQUE UMPIERRE SUAREZ C.S.P. ENRIQUE UMPIERRE SUAREZ PO BOX 365003 SAN JUAN, PR 00936-5003	06/29/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	116844	\$94,028.69
	Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with these invoices in HTA's system.					
2	CARIBBEAN DATA SYSTEM 636 SAN PATRICIO AVE. SAN JUAN, PR 00920	06/01/2020	19-BK-05523-LTS	Puerto Rico Public Buildings Authority (PBA)	174090	\$30,805.76
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of PBA's books and records, there are no outstanding liabilities associated with this invoice in PBA's system.					
3	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	05/22/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	24252	\$5,407.32
	Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with these invoices in HTA's system.					
4	CORPORACION RODUM PO BOX 9023422 SAN JUAN, PR 00902-3422	05/29/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	38195	\$3,989.00
	Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with these invoices in HTA's system.					
5	EQUIPOS Y CONSTRUCTORA RVD INC PO BOX 79176 CAROLINA, PR 00984-9176	05/23/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	23753	\$3,981.20
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.					

## Five Hundred Fifteenth Omnibus Objection

## Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
6	EQUIPOS Y CONSTRUCTORA RVD, INC PO BOX 79176 CAROLINA, PR 00984-9176	05/03/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	10524	\$83,870.40
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.						
7	FLORES LABAULT, CARLOS M. DBA CEL FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR 00960	05/02/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	9860	\$72.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.						
8	LCDO RAMON A RODRIGUEZ COND EL CENTRO I SUITE 3A 500 AVE MUNOZ RIVERA HATO REY, PR 00969	05/29/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	53677	\$3,675.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with these invoices in HTA's system.						
9	PEREZ GUTIE, LCDO EDGARDO 9140 CALLE MARINA CONDominio PONCIONA OFIC 401 PONCE, PR 00731	05/29/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	40776	\$600.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.						

## Five Hundred Fifteenth Omnibus Objection

## Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
10	PFM ASSET MANAGEMENT LLC PO BOX 62923 BALTIMORE, MD 21264-2923	04/12/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	7174	\$90,000.00
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.					
11	RAFAEL J NIDO INC PO BOX 11978 SAN JUAN, PR 00922-1978	05/29/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	43293	\$32,961.12
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.					
12	SKYTEC INC 500 ROAD 869, SUITE 501 CATAÑO, PR 00962-2011	05/24/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	18565	\$7,695.00
	Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with these invoices in HTA's system.					
13	SM ELECTRICAL CONTRACTO AVE SAN CRISTOBAL 3006 COTTO LAUREL PONCE, PR 00731	05/09/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	13449	\$18,925.96
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of HTA's books and records, there are no outstanding liabilities associated with this invoice in HTA's system.					
					TOTAL	\$376,011.45